

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

The Federal Trade Commission, et al.

Plaintiff(s),

v.

The Kroger Company, et al.

Defendant(s).

Case No.: 3:24-cv-00347-AN

MOTION FOR LEAVE TO APPEAR
PRO HAC VICE

Attorney Christian Hudson requests special admission *pro hac vice* to the Bar of the United States District Court for the District of Oregon in the above-captioned case for the purposes of representing the following party (or parties):

AMICI CURIAE - MEMBERS OF CONGRESS (See appendix A)

In support of this application, I certify that: 1) I am an active member in good standing with the New York State Bar; and 2) that I have read and am familiar with the Federal Rules of Evidence, the Federal Rules of Civil and Criminal Procedure, the Local Rules of this Court, and this Court's Statement of Professionalism.

I understand that my admission to the Bar of the United States District Court for the District of Oregon is solely for the purpose of litigating in the above matter and will be terminated upon the conclusion of the matter.

(1) PERSONAL DATA:

Name: Hudson Christian
(Last Name) (First Name) (MI) (Suffix)

Agency/firm affiliation: Cuneo Gilbert & LaDuca, LLP

Mailing address: 300 Cadman Plaza West, 12th Floor, Ste. 12060

City: Brooklyn State: NY Zip: 11201

Phone number: (202) 789-3960 Fax number: _____

Business e-mail address: christian@cuneolaw.com

(2) BAR ADMISSION INFORMATION:

(a) State bar admission(s), date(s) of admission, and bar number(s):
New York (Second Judicial), 3/13/2013, 5099395

(b) Other federal court admission(s) and date(s) of admission:
SDNY (10/25/2013); WDNY (6/28/2019); NDNY (7/11/2019);
ED. Tex. (8/6/2014); EDNY (9/5/2018)

(3) CERTIFICATION OF DISCIPLINARY ACTIONS:

☒ I am not now, nor have I ever been, subject to any disciplinary action by any state or federal bar association or subject to judicial sanctions.

☐ I am now or have been subject to disciplinary action by a state or federal bar association or subject to judicial sanctions. (Attach letter of explanation.)

(4) CERTIFICATION OF PROFESSIONAL LIABILITY INSURANCE:

Pursuant to LR 83-3, I have professional liability insurance, or financial responsibility equivalent to liability insurance, that meets the insurance requirements of the Oregon State Bar for attorneys practicing in this District, and that will apply and remain in force for the duration of the case, including any appeal proceedings.

(5) CM/ECF REGISTRATION:

I acknowledge that I will become a registered user of the Court's case management and electronic case filing system (CM/ECF) upon approval of this application, and I consent to electronic service pursuant to Fed. R. Civ. P. 5(b)(2)(E) and the Local Rules of the District of Oregon.

Certification of Attorney Seeking *Pro Hac Vice* Admission: I have read and understand the requirements of LR 83-3, and I certify that the above information is true and correct.

DATED: 08/05/2024

s/ Christian Hudson

(Signature)

APPENDIX

List of *Amici Curiae*

MEMBERS OF CONGRESS

4 United States Senators

Lead Senator:

Sen. Ron Wyden (OR)

Sen. Maria Cantwell (WA)

Sen. Jacky Rosen (NV)

Sen. Elizabeth Warren (MA)

24 Members of the United States House of Representatives

Lead Representative:

Rep. Pramila Jayapal (WA-07)

Rep. Becca Balint (VT-At Large)

Rep. Lisa Blunt Rochester (DE-At Large)

Rep. Nikki Budzinski (IL-13)

Rep. Cori Bush (MO-01)

Rep. Greg Casar (TX-35)

Rep. Jesus G. “Chuy” García (IL-04)

Rep. Val Hoyle (OR-04)

Rep. Henry C. “Hank” Johnson (GA-04)

Rep. Raja Krishnamoorthi (IL-08)

Rep. Summer Lee (PA-12)

Rep. Ted W. Lieu (CA-36)

Rep. Jerry Nadler (NY-12)

Rep. Alexandria Ocasio-Cortez (NY-14)

Rep. Mary Sattler Peltola (AK-At Large)

Rep. Katherine Porter (CA-47)

Rep. Delia C. Ramirez (IL-03)

Rep. Jan Schakowsky (IL-09)

Rep. Adam B. Schiff (CA-30)

Rep. Kim Schrier, M.D. (WA-08)

Rep. Adam Smith (WA-09)

Rep. Rashida Tlaib (MI-12)

Rep. Bonnie Watson Coleman (NJ-12)

Rep. Nikema Williams (GA-05)